



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



LIESL EICHLER CLARK
DIRECTOR

May 4, 2022

VIA E-MAIL and U.S. MAIL

Jim Saric
Remedial Project Manager
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3511

Dear Jim Saric:

SUBJECT: Michigan Department of Environment, Great Lakes, and Energy (EGLE)
Comments on the Water Quality Work Plan (WQWP) dated February 28,
2022, Area 6 of Operable Unit 5 (OU5), Allied Paper Inc./Portage
Creek/Kalamazoo River Superfund Site (Site).

By way of this correspondence, EGLE formally submits this cover letter and
detailed comments (attached) for inclusion in the Administrative Record for the
Site.

EGLE's detailed comments on the draft subject Area 6 WQWP were developed
after reviewing the subject work plan, presentation slides from Area 6 technical
work group meetings, and comment letters on relevant Area 6 work plans and
technical presentation previously provided by EGLE to the United States
Environmental Protection Agency.

EGLE appreciates the opportunity to review and comment on the subject Work Plan for
Area 6 and looks forward to working with all parties involved on this project. If you have
any questions, please contact Mr. Daniel Peabody, Environmental Quality Analyst,
Remediation and Redevelopment Division at 517-285-3924; PeabodyD@Michigan.gov;
or EGLE, P.O. Box 30426, Lansing, Michigan 48909-7926.

Sincerely,

Daniel Peabody, Environmental Quality Analyst
Superfund Section
Remediation and Redevelopment Division

Attachments

att/cc: Megan Miller, Michigan Department of Attorney General
Dr. Keegan Roberts, CDM Smith
Dr. Lisa Williams, US Fish and Wildlife Service
Matt Diana, MDNR
Jay Wesley, MDNR
Mark Mills, MDNR
Kyle Alexander, EGLE
Luke Trumble, EGLE
David Kline, EGLE
Joseph Walczak, EGLE

**Allied Paper Inc./Portage Creek/Kalamazoo River Superfund Site
Area 6 Water Quality Work Plan
February 28, 2022**

GENERAL COMMENTS

Commenting Organization: EGLE

General Comment #1: Since the water quality parameters to be measured varies seasonally, revise the text to clarify if the proposed sampling period occurs over the same seasonal conditions as the 2019 baseline measurements, and whether there is a need for any seasonal adjustment of the data for comparison to the 2019 baseline conditions.

Commenting Organization: EGLE

General Comment #2: The text in sections 1.4 and 2.1 states that 'solids movement' will be estimated using the proposed sampling program. However, since the proposed program only includes measurements of turbidity, for clarity, revise the text to clearly state turbidity as the metric that will be used as a proxy for water column solids. Also revise the text to clarify if the measured turbidity will be used to estimate suspended sediment concentration.

SPECIFIC COMMENTS

Commenting Organization: EGLE

Section: 1.4 Study Purpose Pages #: 1-7

Lines #:

Specific Comment #1: Revise the two bullets in the section to rephrase term 'solids' as 'turbidity', consistent with the study goals in Section 1.6.2.

Section: 1.5 HYST and Water Quality Platform Technologies Pages #: 1-9

Lines #:

Specific Comment #2: Revise the text to clarify if the YSI EXO3 sondes measure salinity or conductivity.